

# Citizens Opposed to OSS Management Washington Comments to King County OSS DRAFT Plan 2016

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## Plan Audience

State to assure oversight  
Puget Sound Partnership to address clean water  
People of King County to address clean water  
OSS Industry to assure increased income through upgraded standards  
Oss owners

## Work Group Comments from August 23

No mention of contested "Failure definition and rate"

*US EPA says that from state data, it is estimated that 10 to 20% of OSS nation-wide are not effectively treating wastewater, or have failed completely. An OSS may have failed but might not show any visible signs of failure. In some cases older systems were installed without any treatment component at all. There are documented examples in King County of systems directly discharging wastewater from sinks, toilets, showers, clothes washers, etc., directly into Puget Sound.*

Include notation of opposition to recommended fee.

Though the fee is off the table, it should be noted that the community is soundly opposed so records will be available for future planning.

## Equity and Social Justice

The request to remove references that were inappropriate should be then reported as a requirement. The Scoring map should be removed based on the caveat statement that makes it totally irrelevant:

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Confirm action on recommendations. Recommendations were clearly made, but not agreed as incorporated in the Plan. Please acknowledge the following recommendations:

- "Precautionary Principle" should be removed as overstating any possible situation related to OSS.
- Dye testing ... tests should be voluntary. Reference to "fee" should be removed since it is not a recommendation in King County.
- Use of educational materials from other sources should include a review of King County documents that incorrectly demonstrate the function of OSS or unsubstantiated claims of pollution, contamination and health risk.
- Re writing of the RCW regarding MRAs and the extensive criteria to extend boundaries beyond shorelines.

## Pollution data

Confirmed pollution not related to OSS:

While the staff argues that pollution related to Combined Sewer Overflows is not their jurisdiction, pollution in the waters discussed in The Plan have been contaminated by known sources. The pursuit of a small portion associated with OSS in light of enormous waste dumping from other sources should be acknowledged to put perspective on the scope of staff time and funding.

Claims of contamination in water wells, surface water, high risk streams, etc have not been substantiated as coming from OSS. Tests from the Department of Natural Resources and municipalities that vindicate OSS as a source of pollution and that should be recognized.

National Design Rules were noted as a cornerstone of standardization in OSS. Are those standards still the benchmark? If not.... Why? What enormous public health issue or geologic change made gravity feed systems unable to organically treat waste as it had for many approved and permitted systems?

When you use the terms .."not up to standards", what standards are you referencing? Standards today? At the time of permitting? Those are very different and do not imply total failure and need for replacement.

## Professional Maintenance Contracts:

Did King County receive direction to require a signed contract with a private service company to gain the use permit for an OSS? Is it not the responsibility of the owner to properly maintain their OSS.

Who approved this process and when?

Without legal direction, the practice of requiring a maintenance contract should Cease & Desist.

## Plan Audience

Where is the concern for the OSS owner?

*(Best Run Government?)*

Unlawful requirements to sign a maintenance contract,

Assumed to be guilty of contaminating,

Ever changing standards and increasing in cost,

No mention of speeding up the permitting process,

No acknowledgment of new technologies ....

But there was that memo about ending access to As-Built's.....